

STATE OF OHIO)
) SS:
COUNTY OF CUYAHOGA)

1:12 MJ 4069

UNITED STATES POSTAL INSPECTION SERVICE

I, BRYON J. GREEN, DO HEREBY DEPOSE AND SAY:

I am a United States Postal Inspector and have been so employed since October 2006, presently assigned at Cleveland, Ohio to investigate Prohibited Mailing offenses. I have received training in the detection and investigation of prohibited mailing offenses. I have worked U.S. Postal Service related investigations for approximately 5 years, during which time I have been the case agent for investigations leading to prosecution in U. S. District Court, as well as state courts.

I know from my training and experience that Express Mail is commonly used to transport controlled substances because the Express Mail system provides traceability and reliable delivery. Further, the expected timeliness of Express Mail places time pressures on law enforcement agents to identify, search and deliver these drug parcels in a timely manner.

On March 22, 2012, your affiant was contacted by Postal Service management from the San Francisco, 94124 Post Office regarding an Express Mail parcel that had been returned to San Francisco, California because the Ohio return address was identified by the letter carrier as vacant. The subject parcel was described as U. S. Postal Service Express Mail parcel bearing label no. EI085678095US addressed to Timothy Staples, 4619 Lambert Rd. South Euclid, OHIO 44121 with a return address of Mark Jones, 1425 Revere St. S.F. CA 94124.


In furtherance of the investigation, your affiant made inquiries with Accurant, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name and address information, concerning the subject delivery address of 4619 Lambert Rd. South Euclid, OHIO 44121 and was unable to associate the name Timothy Staples at the delivery address. Your affiant also made inquiries with Accurant and concerning the return address of 1425 Revere St. S.F. CA 94124 and was unable to associate the name Mark Jones at the return address. Your affiant advised San Francisco, 94124 Postal Service management to forward the subject parcel to Cleveland, OH for further investigation.

On March 26, 2012, your affiant recovered the subject Express Mail parcel, which is further described as a white cardboard box, measuring approximately 12" X 12" X 6" in size and weighing approximately 3 pounds 1 ounces. The subject Express Mail parcel was mailed on March 7, 2012, from the San Francisco, California Post Office 94134 and bore \$46.95 in U.S. postage. Your affiant knows California has historically been a source area for mailed controlled substances into Northern Ohio.

On March 27, 2012, the subject parcel was subjected to "Sammy", a narcotic detection canine handled by Detective Michael Twombly of the Cuyahoga County Sheriff's Department. According to Detective Twombly, Sammy gave a positive alert on the subject parcel. According to Detective Twombly, this positive alert meant Sammy detected the odor of an illegal drug emanating from the parcel.

Detective Twombly has been State Certified as a Narcotics Canine handler and he and narcotics canine Sammy have worked together since 2007. Detective Twombly and canine Sammy were both recertified in March 2011 by the Ohio Peace Officers Training Academy (OPOTA). Detective Twombly and canine Sammy have both completed 200 hours of a state-certified training program at Excel K-9 Services, Inc., in Lyndhurst, Ohio under Certified Trainer Paul J. Shaughnessy of the NAAPWDA, a nationally organized police work dog association that provides training for dogs and handlers. During this time, Sammy was trained and certified to alert to the presence of the odors from marijuana, cocaine, heroin, MDEA (methylenedioxyethamphetamine), MDMA (methylenedioxymethamphetamine), methamphetamine ("crystal meth"), and/or their derivatives. Detective Twombly has been trained how to handle a detector K-9 and read his alerts.

Based on the information contained herein, your affiant maintains there is probable cause to believe that the U. S. Postal Service Express Mail parcel bearing label no. EI085678095US addressed to Timothy Staples, 4619 Lambert Rd. South Euclid, OHIO 44121 with a return address of Mark Jones, 1425 Revere St. S.F. CA 94124 contains controlled substances, and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1)


BRYON J. GREEN
POSTAL INSPECTOR

SUBSCRIBED AND SWORN TO BEFORE ME
THIS 27th DAY OF MARCH, 2012, AT
CLEVELAND, CUYAHOGA COUNTY, OHIO


NANCY A. VECCHIARELLI
U.S. MAGISTRATE JUDGE